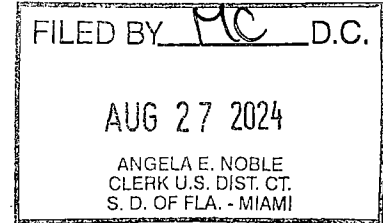


****Kendrick Sloan, Plaintiff,****

****v.****

****Bureau of Prisons, Defendant.****



****COMPLAINT FOR NEGLIGENCE AND DEMAND FOR JURY TRIAL****

****INTRODUCTION****

Plaintiff, Kendrick Sloan, alleges as follows:

1. This is a complaint for damages arising out of the Bureau of Prisons' (BOP) negligence and inaction regarding the Plaintiff's urgent need for ankle surgery.

****PARTIES****

2. Plaintiff, Kendrick Sloan, is a resident of the District of Massachusetts and is currently incarcerated at FMC Devens.

3. Defendant, Bureau of Prisons (BOP), is a federal agency responsible for the operation of the federal prison system.

****FACTS****

4. In 2018, a medical specialist in the California Prison system acknowledged that Plaintiff required ankle surgery. This determination was documented and will be attached to this claim.

5. Despite the clear recommendation for surgery in 2018, the BOP has neglected to schedule the necessary procedure, resulting in years of needless suffering for the Plaintiff.

6. Since February 2023, the BOP has been stating that a date for surgery is pending. However, no date has been confirmed to date.

7. The Plaintiff has made numerous inquiries regarding the status of this surgery, both at F.C.I Miami and FMC Devens. Despite these repeated requests, no action has been taken, and no response has been given.

8. As a result of the BOP's inaction, the Plaintiff has experienced constant pain, anxiety, and emotional distress.

****CLAIMS FOR RELIEF****

****Negligence****

9. The Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 8 as if fully set forth herein.

10. The BOP owed a duty of care to the Plaintiff to provide necessary medical assistance, including the recommended ankle surgery.

11. The BOP breached this duty by failing to schedule and perform the necessary surgery, despite clear documentation and repeated requests from the Plaintiff.

12. As a direct and proximate result of the BOP's negligence, the Plaintiff has suffered and continues to suffer significant pain, emotional distress, and other damages.

****PRAYER FOR RELIEF****

WHEREFORE, Plaintiff Kendrick Sloan respectfully requests that this Court:

1. Enter judgment in favor of Plaintiff and against Defendant for all damages that the Court deems appropriate, including but not limited to compensatory damages, punitive damages, and costs of this action;
2. Order the BOP to take immediate action to schedule and perform the necessary ankle surgery;
3. Grant such other and further relief as this Court may deem just and proper.

DATED this 12 day of July , 2024 .

A handwritten signature in black ink, appearing to read "Kendrick Sloan", is written over a horizontal line.

Kendrick Sloan,

Plaintiff

Hendrick Sloan #64097-308
FMC Devens

Federal Medical Center
P.O. Box 879
Ayer, MA 01432

United States District Court
Southern District of Florida
Miami Division
Main Courthouse
Wilkie D. Ferguson, Jr.
400 North Miami Avenue
Miami, FL 33128

RECEIVED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
AUG 29 2024

